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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 EVELYN DOUGLAS, an individual;

Case No.: 2:23-cv-00425-APG-BNW

10 Plaintiff;

11 v.

12 TDS FINANCIAL, LLC, a foreign limited-
liability company; TYLER STONE,
individually;

13 **STIPULATED DISCOVERY PLAN AND**
SCHEDULING ORDER

14 Defendants.

15 **SUBMITTED IN COMPLIANCE WITH**
LR 26-1(b)

16
17 Under FRCP 26(f) and LR 26-1, counsel held a telephonic conference on June 7, 2023.

18 Based on the conference, the parties propose to the Court the following discovery plan:

- 19 a. **FRCP 26(a)(1) Disclosures: June 21, 2023**
- 20 b. **Amend Pleadings and Add Parties: August 8, 2023**
- 21 c. **FRCP 26(a)(2) Disclosures (Experts):**
 - 22 i. Expert Disclosure: **September 7, 2023**
 - 23 ii. Rebuttal Expert Disclosure: **October 10, 2023**
- 24 d. **Close of Discovery: November 6, 2023**
- 25 e. **Dispositive Motions: December 6, 2023**
- 26 f. **Pretrial Order: January 5, 2024**
- 27 g. The disclosures required by FRCP 26(a)(3) shall be made in the joint pretrial order.
28 If dispositive motions are filed, the deadline for filing the joint pretrial order will be

1 suspended until 30 days after decision on dispositive motions or further court order.

- 2 h. Subjects of Discovery: Discovery will be needed on the following subjects: All
3 claims set forth in the complaint as well as the defenses relevant to the action. No
4 discovery phases are needed or requested by the parties at this time.
- 5 i. Disclosures under Rule 26(a): Aside from electronic submission, the parties have no
6 changes to the timing, form, or requirement for disclosures under Rule 26(a).
- 7 j. Protective Order(s): Defendants anticipate the production of confidential, trade
8 secret, and/or commercially sensitive information during the pendency of this action.
9 As such, defendants may request a protective order to be entered by the court to
10 govern the use and disclosure of information that is deemed confidential, trade secret,
11 and/or commercially sensitive;
- 12 k. Settlement: The parties have engaged in settlement discussions.
- 13 l. Later Appearing Parties: A copy of this discovery plan and scheduling order shall be
14 served by Plaintiff on any person served after it is entered, or, if an additional
15 defendant should appear, within five (5) days of their first appearance. This discovery
16 plan and scheduling order shall apply to such later-appearing parties, unless the court,
17 on motion and for good cause shown orders otherwise.
- 18 m. Extension or Modification of the Discovery Plan and Scheduling Order: LR 26
19 governs modifications or extensions to this discovery plan and scheduling order.
- 20 n. Alternative Dispute Resolution: The parties certify that they met and conferred about
21 the possibility of using alternative dispute-resolution processes including mediation,
22 arbitration, and if applicable, early neutral evaluation;
- 23 o. Alternative Forms of Case Disposition: The parties certify that they considered
24 consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P.
25 73 and the use of the Short Trial Program (General Order 2013-01).
- 26 p. Electronic Evidence: The parties do not anticipate discovery issues at this time and
27 do not foresee any issues arising from the disclosure of electronically stored
28 information. The parties agree to serve discovery requests, discovery responses, and

1 disclosures via electronic mail or U.S. Mail.

2 Dated: June 7, 2023

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4 **LAW OFFICE OF
KEVIN L. HERNANDEZ**

5 */s/ Kevin L. Hernandez*
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Dated: June 7, 2023

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10 **IT IS SO ORDERED:**

11 
12 UNITED STATES MAGISTRATE JUDGE

13 DATED: June 8, 2023

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